

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION	No. 2:12-md-02323-AB  MDL No. 2323
Kevin Turner and Shawn Wooden, <i>on behalf of themselves and others similarly situated,</i>  Plaintiffs,  v.  National Football League and NFL Properties, LLC, successor-in-interest to NFL Properties, Inc.,  Defendants.	Civ. Action No.: 14-cv-00029-AB
THIS DOCUMENT RELATES TO: ALL ACTIONS	

**JOINT REPLY IN FURTHER SUPPORT OF MOTION FOR EXTENSION OF  
TIME TO RESPOND TO MOTION TO DETERMINE PROPER  
ADMINISTRATION OF CLAIMS UNDER THE SETTLEMENT AGREEMENT**<sup>1</sup>

The National Football League and NFL Properties LLC (the “NFL Parties”) and Co-Lead Class Counsel (collectively, the “Parties”) submit this reply in further support of their Motion for Extension of Time to Respond to the Motion to Determine Proper Administration of Claims Under the Settlement Agreement. In support thereof, the Parties state as follows:

---

<sup>1</sup> Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

1. On August 23, 2017, counsel for movants filed an opposition to the Motion for Extension, including supporting declarations. [Doc. # 8309].

2. The supporting declarations allege purported facts about which the Parties are unaware. This further supports the request of the Parties for additional time to look into the matters raised by the movants and respond appropriately thereafter. Indeed, as the movants admit, the “[t]he Class Members deserve the attention and time of the CLC [Co-Lead Class Counsel] and the NFL Parties to investigate and respond....” ( Doc. # 8309 at ¶ 6).

3. Regarding the concern movants raise about their time to respond to the underlying Notices, we have confirmed with BrownGreer that, in keeping with its earlier representations to counsel for the movants, new Notices were issued to each of the movants and that the dates for response to the Notices have all been extended to December 22, 2017. This should eliminate any concern that they may have about having sufficient time to respond the Notices.

WHEREFORE, the NFL Parties and Co-Lead Class Counsel respectfully submit that the Motion for Extension be granted.

Dated: August 24, 2017

Respectfully Submitted:

/s/ Christopher Seeger  
Christopher Seeger  
**SEEGER WEISS LLP**  
77 Water Street  
New York, NY 10005  
Phone: (212) 584-0700  
Fax: (212) 584-0799  
[cseeger@seegerweiss.com](mailto:cseeger@seegerweiss.com)

*Co-Lead Class Counsel*

/s/ Brad Karp  
Brad S. Karp  
Bruce Birenboim  
Lynn B. Bayard  
**PAUL, WEISS, RIFKIND, WHARTON  
&  
GARRISON LLP**  
1285 Avenue of the Americas  
New York, NY 10019-6064  
Phone: (212) 373.3000  
Fax: (212) 757.3990

Sol Weiss  
**ANAPOL WEISS**  
130 North 18<sup>th</sup> Street, Suite 1600  
Philadelphia, PA 19103  
Phone: (215) 735-1130  
Fax: (215) 735-2024  
[sweiss@anapolweiss.com](mailto:sweiss@anapolweiss.com)

***Co-Lead Class Counsel***

[bkarp@paulweiss.com](mailto:bkarp@paulweiss.com)  
[bbirenboim@paulweiss.com](mailto:bbirenboim@paulweiss.com)  
[lbayard@paulweiss.com](mailto:lbayard@paulweiss.com)

***Attorneys for National Football League  
and NFL Properties LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served on all counsel of record via the Court's ECF system on August 24, 2017.

/s/Christopher A. Seeger

Christopher A. Seeger